

**Federal Defenders  
OF NEW YORK, INC.**

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September 29, 2023

**BY EMAIL & ECF**

The Honorable Jennifer E. Willis  
United States Magistrate Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Gregory Gumucio  
22 Mag. 6904**

Dear Judge Willis:

We represent Gregory Gumucio in the above-captioned matter. We write to respectfully request a modification of Mr. Gumucio's bail conditions to permit him to travel to the District of Idaho, specifically to Moscow, Idaho, five miles away from Pullman, WA, where Mr. Gumucio's son is currently a first-year college student. Pretrial Services consents to this request; the government defers to Pretrial.

At Mr. Gumucio's presentment on August 30, 2022, the Court set the following bail conditions:

\$250,000 personal recognizance bond to be co-signed by two financially responsible persons and one individual with moral suasion (specifically, Mr. Gumucio's adult son); compliance with pretrial services supervision as directed; no airport travel (with specifics to be set by pretrial services); standalone location monitoring; no direct or indirect contact with any current or former employees of Yoga to the People identified by the government; no travel within 60 miles of the Canada border; surrender all travel documents with travel restricted to the Western District of Washington, the District of Oregon (solely for child's sports-related travel), and the Southern District of New York.

On October 7, 2022, the Court modified the bond conditions to require only two financially responsible cosigners. On January 26, 2023, the Court modified the travel conditions to permit Mr. Gumucio to travel to Portland, Oregon, to seek employment. And on March 20, 2023, the Court modified the travel conditions to permit him to travel to the Eastern District of Washington for his daughter's sporting events.

On April 24, 2023, the Court granted Mr. Gumucio's request to travel within the Eastern District of Washington and the District of Oregon, provided he does not travel within ten miles of an airport.

Earlier this year, Mr. Gumucio's son graduated from high school; he currently attends Washington State University in Pullman, WA, in the Eastern District of WA. Mr. Gumucio has not seen his son for two months and would like to travel by car to visit his son at college. In addition to Pullman, Mr. Gumucio's son has asked his father to join him in Moscow, Idaho, just five miles beyond the border of the Eastern District of WA. We understand there is a small airport in Moscow, Idaho, which, under the current bail conditions, would preclude Mr. Gumucio from visiting his son at college in Pullman, WA. The current conditions would also restrict Mr. Gumucio's travel to Moscow, Idaho.

It has now been more than a year since Mr. Gumucio's arrest on this matter. In that time, he has complied with all of the conditions of his release and has not incurred any violations whatsoever. Indeed, in response to a request for pretrial services' position on this bail modification, Mr. Gumucio's pretrial services officer wrote, "I do not have any concerns with this travel especially since Mr. Gumucio is still on location monitoring. I had a nice conversation with him today, his children are very important to him and it seems like his son is excited to show them where he spends time."

Mr. Gumucio seeks modification of the release conditions to permit him to travel to Pullman, WA, and the District of Idaho. As noted, Pretrial Services and the government have no objection to this request.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.  
Michael Arthus, Esq.

*Counsel for Gregory Gumucio*

cc: Counsel of record

**SO ORDERED:**

  
**THE HONORABLE JENNIFER E. WILLIS**  
United States Magistrate Judge